

**IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF PENNSYLVANIA**

THE MIDDLE EAST FORUM	:	CIVIL ACTION
	:	
	:	NO. 2:19-cv-05697-JS
Plaintiff,	:	
v.	:	
	:	
LISA REYNOLDS-BARBOUNIS	:	MOTION FOR SANCTIONS
	:	
Defendant.	:	
	:	

**DEFENDANT, LISA BARBOUNIS' COMBINED RESPONSE TO
PLAINTIFF'S FOURTH MOTION TO COMPEL AND TO COMPEL
THIRD PARTY WITNESSES TO PRODUCE RESPONSES TO SUBPOENAS**

Defendant, Lisa Barbounis requests that Plaintiff, The Middle East Forum's Fourth Motion to Compel Defendant to Produce Discovery and Motion to Compel Third Party to Produce Full and Complete Responses to Subpoenas be denied. Plaintiff's combined Motions and Exhibits are 128 pages presenting arguments for resolution of discovery disputes that the parties have never discussed. According to the Court's Policies and Procedures, Section II.C., the parties are required to meet and confer to resolve discovery disputes. Counsel for Defendant has received multiple telephone calls from counsel for Plaintiff on other issues, including the scheduling and rescheduling of Lisa Barbounis's IME in a related matter. The last time the parties spoke was in July 2020. Moreover, if the parties are unable to resolve a discovery dispute the Court has directed the parties to make a simple request for a telephone conference. This is yet another example where Plaintiff has disregarded the Court's policies and procedures and previous Orders including Document-59 filed June 26, 2020. Instead, Plaintiff drafted extensive Motions and then argues that Defendant should bare the cost of these Motions. Defendant can address the veracity of the argument Plaintiff presents in Document 63 and Document 64 (Plaintiff's Motions

upon which this combined Response is based). However, Defendant requests that Plaintiff's Motions be denied for failure to follow the Court's policies and procedures. Defendant requests an opportunity to discuss the issues presented in Defendants' Motion, all of which are presented for the first time in Defendant's Motion or unilateral correspondence that was never discussed.

DEREK SMITH LAW GROUP, PLLC

By: /s/ Seth D. Carson
Seth D. Carson, Esquire
1835 Market Street, Suite 2950
Philadelphia, Pennsylvania 19103
Phone: 215.391.4790
Email: seth@dereksmithlaw.com

DATED: September 14, 2020

CERTIFICATE OF SERVICE

I hereby certify that, on April 3, 2020, a true and correct copy of the foregoing Motion and Response was filed and served electronically through the Court's CM/ECF system.

Sidney L. Gold sgold@discrimlaw.rf
Sidney L. Gold & Associates P.C.
1835 Market Street, Suite 515
Philadelphia, PA 19103
Tel: (215) 569-1999
Fax: (215) 569-3870
Counsel for The Middle East Forum

DEREK SMITH LAW GROUP, PLLC

By: /s/ Seth D. Carson
Seth D. Carson, Esquire
1835 Market Street, Suite 2950
Philadelphia, Pennsylvania 19103
Phone: 215.391.4790
Email: seth@dereksmithlaw.com

DATED: September 14, 2020